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7  
8 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 LAEL MELVIN PERKINS, ET AL.,

13 Defendant.  
14

Case No.: 2:24-CR-00202-JAD-BNW

**Stipulation for a Protective Order**

15 The parties, by and through the undersigned, respectfully request that the Court issue an  
16 Order protecting from disclosure to the public or any third party not directly related to this case,  
17 discovery related to an ongoing cyber investigation (the “Protected Material”). The parties state  
18 as follows:

19 1. On September 10, 2024, a grand jury returned an indictment charging the  
20 defendants with Conspiracy to Distribute Controlled Substances—fentanyl in violation of 21  
21 U.S.C. §§ 846, 841(a)(1), (b)(1)(B)(vi) and Distribution of a Controlled Substance—fentanyl in  
22 violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi). ECF No. 1.

23 2. The trial date is currently set for March 25, 2025. ECF No.22.

24 3. The government has discovery related to an ongoing cyber investigation (Protected

1 Material). The government believes that, because of the sensitive nature of the information and  
2 the ongoing investigation, the Protected Material may only be provided pursuant to a protective  
3 order.

4 4. In order to prevent dissemination of the Protected Material, the parties intend to  
5 restrict access to the Protected Material in this case to the following individuals: attorneys for all  
6 parties and any personnel that the attorneys for all parties consider necessary to assist in  
7 performing the attorneys' duties in the prosecution or defense of this case, including the  
8 defendants, investigators, paralegals, experts, support staff, interpreters, and any other  
9 individuals specifically authorized by the Court (collectively, the "Covered Individuals").

10 5. Without leave of Court, the Covered Individuals shall not:

- 11 a. make copies for, or allow copies of any kind to be made by any other person of  
12 the Protected Material in this case or permit dissemination of the Protected  
13 Material, to include leaving a copy of the Protected Material at a detention  
14 facility;
- 15 b. allow any other person to review the Protected Material;
- 16 c. use the Protected Material for any purpose other than preparing to defend  
17 against or prosecute the charges in the indictment or any superseding  
18 indictment arising out of this case; or
- 19 d. attach the Protected Material to any of the pleadings, briefs, or other court  
20 filings except to the extent those pleadings, briefs, or filings are filed under seal.

21 6. Nothing in this stipulation is intended to restrict the parties' use or introduction of  
22 the Protected Material as evidence at trial or support in motion practice. If the defendant proceeds  
23 to trial or any evidentiary hearing, the parties will confer to determine whether the terms of this  
24 stipulation should be revisited.

1           7.       The parties shall inform any person to whom disclosure may be made pursuant to  
2 this order of the existence and terms of this Court's order.

3           8.       The defendants hereby stipulate to this protective order.

4           DATED: March 3, 2025.

5                               Respectfully submitted,

6                               For the United States:

7                               SUE FAHAMI  
8                               Acting United States Attorney

9                               /s/ Edward D. Penetar  
10                              EDWARD D. PENETAR  
11                              Assistant United States Attorney

12                             For the Defense:

13                             /s/ William Michael Horvath  
14                             WILLIAM MICHAEL HORVATH, ESQ.  
15                             Attorney for LAEL MELVIN PERKINS

16                             /s/ Christopher T. Rasmussen  
17                             CHRISTOPHER T. RASMUSSEN, ESQ.  
18                             Attorney for KESHAWN COX

19                             **ORDER**

20       The Court **GRANTS** the above stipulated protective order (ECF No. 27). All motions to  
21       seal must comply with Local Rule IA 10-5 and *Kamakana v. City & Cnty. of Honolulu*, 447  
22       F.3d 1172 (9th Cir. 2006). **IT IS SO ORDERED.**

23                               
24                             UNITED STATES MAGISTRATE JUDGE

                              DATED: March 4, 2025